

## OGC Has Reviewed

22 March 1977

### MEMORANDUM FOR THE RECORD

STATINTL FROM : [REDACTED]  
Deputy Chief, Benefits and Services Division

SUBJECT: OGC Opinion re GEHA Regulation by D. C. and  
Virginia Insurance Commission, dated  
28 Feb 77

On 17 March 1977 I called [REDACTED] in OGC regarding his memo of 28 February 1977. I indicated that we had some concern with paragraph 9(e) of his memo in that we, GEHA, are responsible for the free retiree coverage under UBLIC. I briefly outlined how this came about. [REDACTED] indicated that he was not aware of this but it did not change his position. He said there were approximately 10 factors to consider in reaching that position. He was 90% sure of his position before I called and now perhaps 85% sure. He referred to the Metropolitan Police Retiring Association case and the Mosanto Co. case mentioned in his memo. He is still of the opinion that GEHA is not subject to the regulatory authority of either D. C. or Virginia.

STATINTL

STATINTL

STATINTL

[REDACTED]

TRANSMITTAL SLIP

MAR 1977

TO: Chief, BSD

ROOM NO. BUILDING

REMARKS:

Please review to be sure  
memo is responsive.

FROM: DD/pers

ROOM NO. BUILDING EXTENSION

PERS 77-664

SENDER WILL CHECK CLASSIFICATION TOP AND BOTTOM

UNCLASSIFIED

CONFIDENTIAL

SECRET

4-00 8R000200150007-2

## OFFICIAL ROUTING SLIP

TO	NAME AND ADDRESS	DATE	INITIALS
1	DD/PERS 2 MAR 1977	3 MAR 1977	
2	5E58		
3	C1 (B8) - PLS review to see sure name is responsible		
4			
5	Policy File		
6			

ACTION	DIRECT REPLY	PREPARE REPLY
APPROVAL	DISPATCH	RECOMMENDATION
COMMENT	FILE	RETURN
CONCURRENCE	INFORMATION	SIGNATURE

Remarks: Ben,

STATINTL

The attached by [REDACTED] addresses the matter of any requirements on GEHA with respect to the insurance regulatory agencies of D.C. and Va. This, as you know, comes up from time to time and I believe Mike's paper should put it to rest.

Make copy for BSD

STATINTL

NAME TO RETURN TO SENDER	
ADDRESS AND PHONE NO.	DATE
OGC 7D01	3/1/77
UNCLASSIFIED	CONFIDENTIAL
SECRET	

FORM NO. 237 Use previous editions

(40)